Case 7:23-cv-00519-CS-VR Document 42 Filed 07/09/24 Page 1 of 2



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## **MEMO ENDORSED**

July 8, 2024

## VIA ECF

Honorable Victoria Reznik United States Magistrate Judge Federal Building and United States Courthouse 300 Quarropas Street White Plains, New York 10601-4150

Re: Rosario, et al., v. Community Housing Management Corp., et al.

Case No.: 7:22-cv-9855 (CS)(VR)

Saintil, et al., v. Community Housing Management Corp., et al.

Case No.: 7:22-cv-9855 (CS)(VR)

## Dear Judge Reznik:

We represent all the plaintiffs in the above captioned matters and submit this communication as a joint request by all parties.

We write with respect to the Civil Case Management Plan and Scheduling Order ("Scheduling Order"), dated May 14, 2024. The parties continue to examine all noticed parties/non-parties. However, due to time constraints and party/non-party availability during the Summer, the parties jointly request a modified Scheduling Order. The parties request modifications as follows:

- 5(a) the fact discovery deadline to be modified from July 10, 2024 to August 14, 2024;
- 5(d) the fact deposition deadline to be modified from July 10, 2024 to August 14, 2024;
- 7(a) Expert Discovery Deadline. Modified from October 18, 2024 to November 18, 2024;
- 7(b) Plaintiff's Expert Reports. Modified from September 9, 2024 to October 9, 2024;
- 7(c) Defendants' Expert Reports. Modified from September 9, 2024 to October 9, 2024;
- 7(d) Rebuttal Expert Reports. Modified from September 30, 2024 to October 30, 2024.



We respectfully thank the Court for its kind consideration herein.

Respectfully submitted,

CSI GROUP LAW FIRM, P.C.

By: s/<u>Marc W. Garbar</u> Marc W. Garbar

The parties' request to extend the discovery deadlines is **GRANTED**. The deadlines for the remainder of discovery are as set forth above. All discovery must be completed by November 18, 2024.

APPLICATION GRANTED

Dated: July 9, 2024
Hon. Victoria Reznik, U.S.M.J

